

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY	)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor	)	
indenture trustee for certain series of	)	JUDGE BECKWITH
Senior Notes, <i>et al.</i> ,	)	MAGISTRATE JUDGE BOWMAN
	)	
Plaintiffs,	)	
v.	)	
	)	
AMERICAN ELECTRIC POWER, <i>et al.</i> ,	)	
	)	
Defendants.		

**MOTION OF PROGRESSIVE CASUALTY INSURANCE COMPANY FOR  
ENTRY OF AGREED ORDER EXTENDING TIME UP TO AND INCLUDING  
SEPTEMBER 29, 2011 TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFFS' COMPLAINT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for certain series of Senior Notes, Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for certain series of Senior Notes, and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Plaintiffs"), and Defendant Progressive Casualty Insurance Company ("Progressive"), have agreed to extend the time within which Defendant Progressive may answer or otherwise respond to Plaintiffs' complaint until September 29, 2011, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local Rule 7.3(a) and 7.4, Defendant Progressive hereby moves the Court to grant the requested extension per the parties' agreement. This motion briefly exceeds the permissible stipulation of Local Rule 6.1(a); and, therefore requires approval of the Court.

Respectfully submitted,

/s/ Todd A. Atkinson

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2011, a copy of the foregoing *Motion of Progressive Casualty Insurance Company for Entry of Agreed Order Extending Time up to and including September 29, 2011 to Answer or Otherwise Respond to Plaintiffs' Complaint* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's Electronic Case Filing System. Parties may access this filing through the Court's Electronic Case Filing System.

/s/ Todd A. Atkinson  
*One of the Attorneys for Defendant  
Progressive Casualty Insurance  
Company*